

HON. MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHSHORE SHEET METAL, INC.,

Plaintiff,

v.

SHEET METAL WORKERS
INTERNATIONAL ASSOCIATION,
LOCAL 66,

Defendant,

No. 2:15-CV-1349-MJP

**DECLARATION IN RESPONSE
TO NORTHSHORE'S MOTION
FOR TEMPORARY
RESTRAINING ORDER**

Tim Carter makes the following declaration in accordance with 28 U.S.C. §1746:

1. I am the Business Manager with Sheet Metal Workers International Association, Local 66 ("Local 66"), and have been so at all times material to the events in this case.

2. As Business Manager, my job is to enforce Local 66's collective bargaining agreement, negotiate new collective bargaining agreements, and to dispatch employees to our signatory contractors. Local 66's collective bargaining agreement covers sheet metal work performed in Western Washington, from Longview to the Canadian border.

3. The Plaintiff, Northshore Sheet Metal, Inc. ("Northshore"), is one of the contractors with whom Local 66 has a collective bargaining agreement.

DECLARATION IN RESPONSE TO
NORTHSHORE'S MOTION FOR
TEMPORARY RESTRAINING ORDER
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5. While the parties have gotten close, they have been unable to reach agreement on several important items. Accordingly, Local 66 held a meeting on or about August 10 with its membership to discuss a potential strike. Ultimately, the membership voted overwhelmingly to authorize a strike against Northshore.

6. The primary bases for the strike were Northshore's refusal to agree to language regarding union stewards and refusal to agree to language relating to its responsibilities as a union contractor when traveling to other geographic areas. While the issue of Northshore's failure to pay benefits was discussed, the primary basis for the strike is the failure of the parties to reach agreement on a new collective bargaining agreement.

Signed on August 24, 2015, at Everett, Washington.

Tim Carter